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April 16, 2021

Filed by ECF

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *Johnna L. Ayres v. Robert J. Shiver et al.*
Civil Action No. 1:21-cv-00473-ERK-PK
Communication with Chambers

Dear Magistrate Judge Kuo:

The Wagner Law Group, P.C. represents the Plaintiff in this action. Defendants indicated that they plan to file a Rule 12 motion. Counsel has conferred and jointly advise the court of the following briefing schedule:

- Defendants to serve their Motion to Dismiss on or before Friday, May 14, 2021;
- Plaintiff to serve her Opposition to Defendants' Motion to Dismiss on or before Friday, June 18, 2021; and
- Defendants to serve their Reply and file the fully briefed motion on Friday, July 9, 2021.

In light of the proposed briefing schedule and in interest of judicial economy, the parties jointly request that the upcoming telephonic conference, scheduled for April 30, 2021, be cancelled pending the outcome of the motion. No application for the relief sought herein has previously been made. In addition, we request that discovery be stayed pending the outcome of the motion.

This letter application has been made with notice and consent of all parties.

Respectfully submitted,

David Gabor
David Gabor, Esq.
Counsel for Plaintiff

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